

EXHIBIT 2

From: sdraffin@keyhanillc.com
Sent: Wednesday, November 6, 2024 11:09 AM
To: Joon Chung
Cc: dkeyhani@keyhanillc.com; Frances Stephenson; Kevin R. Mosier; Lisa M. Tittlemore; Steve Ramsdell; FRService-Samsonite-24cv11636
Subject: RE: Swissdigital/Samsonite - Swissdigital Infringement Contention Asserted Claims

Hi Joon,

To ensure that the parties are on the same page, please note that it is not Plaintiff's obligation to identify information it needs from discovery or samples. Pursuant to Local Rule 16.6(d)(4), Defendant is obligated to provide Plaintiff with technical documents and sample products. We do not agree with your statement that every accused product is publicly available. Several accused products (e.g., EBAGS Pro Slim USB Laptop Backpack, Quadriion line, etc.) are not. Samsonite is not relieved of its obligations under Local Rule 16.6(d)(4) merely because (as is true in almost every patent infringement case) Samsonite's products are available to purchase.

As previously stated, the infringement matrix (Exhibit B) discloses the specific claims that Swissdigital is asserting against each product. Your understanding regarding the '071 patent is correct.

Best,

Scott

-----Original Message-----

From: "Joon Chung" <chung@fr.com>
Sent: Tuesday, November 5, 2024 5:18pm
To: "sdraffin@keyhanillc.com" <sdraffin@keyhanillc.com>
Cc: "dkeyhani@keyhanillc.com" <dkeyhani@keyhanillc.com>, "Frances Stephenson" <fstephenson@keyhanillc.com>, "Kevin R. Mosier" <kmosier@sunsteinlaw.com>, "Lisa M. Tittlemore" <ltittlemore@sunsteinlaw.com>, "Steve Ramsdell" <sramsdell@sunsteinlaw.com>, "FRService-Samsonite-24cv11636" <FRService-Samsonite-24cv11636@fr.com>
Subject: RE: Swissdigital/Samsonite - Swissdigital Infringement Contention Asserted Claims

Scott,

Thank you for the explanation. You have not identified any information that Swissdigital needs from discovery or samples that it does not already have access to publicly. Every accused product (including those Swissdigital did not chart in its contentions) is publicly available, and the accused patented features (*i.e.*, the sheaths, USB ports, and surrounding areas) are simple and readily observable/visible from a physical inspection without the need for any technical documentation. Setting that aside, we understand your email to mean that Swissdigital's contentions regarding what specific claims are asserted against what specific products are found only in Exhibit B to its contentions (the "infringement matrix"). For example, we understand that Swissdigital does not assert any claims of the '071 patent against the SXX Slim Backpack or SXX Spinner Underseater products charted for other patents because they are not identified in the "infringement matrix". Please let us know immediately if you disagree and if so, explain why.

Best,
Joon

From: sdraffin@keyhanillc.com <sdraffin@keyhanillc.com>
Sent: Tuesday, November 5, 2024 7:46 AM
To: Joon Chung <chung@fr.com>
Cc: dkeyhani@keyhanillc.com; Frances Stephenson <fstephenson@keyhanillc.com>; Kevin R. Mosier

<kmosier@sunsteinlaw.com>; Lisa M. Tittlemore <ltittlemore@sunsteinlaw.com>; Steve Ramsdell
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[This email originated outside of F&R.]

Hi Joon,

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From: "Joon Chung" <chung@fr.com>

Sent: Friday, November 1, 2024 5:51pm

To: "Scott Draffin" <sdraffin@keyhanillc.com>, "dkeyhani@keyhanillc.com" <dkeyhani@keyhanillc.com>, "Frances Stephenson" <fstephenson@keyhanillc.com>, "Kevin R. Mosier" <Kmosier@sunsteinlaw.com>, "Lisa M. Tittlemore" <LTittlemore@sunsteinlaw.com>, "Steve Ramsdell" <SRamsdell@sunsteinlaw.com>

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Subject: Swissdigital/Samsonite - Swissdigital Infringement Contention Asserted Claims

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Additionally, for all service emails to Samsonite going forward, please copy the address, frservice-samsonite-24cv11636@fr.com, cc'ed here.

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Joon Chung

Associate ■ Fish & Richardson P.C.

T: 404 724 2805 | chung@fr.com

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